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Before the
FEDERAL COMMUNICATIONS COMMISSION
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JAN 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Administration of the North)
American Numbering Plan)
TO: The Commission)

CC Docket No. 92-237

**REPLY COMMENTS OF
AMERICAN PERSONAL COMMUNICATIONS**

American Personal Communications ("APC")^{1/} hereby
replies to the comments filed in response to Phase 2 of the
Commission's Notice of Inquiry ("NOI") in the above-captioned
docket relating to the administration of the North American
Numbering Plan ("NANP").^{2/}

APC agrees with the view that carrier identification
codes ("CICs") are a precious resource, which must be managed
carefully.^{3/} In order for new services and new service
providers to have access to this important resource and, in
particular, for personal communications services ("PCS") to be
launched successfully, it is essential that a sufficient
number of CICs be available. Since APC is concerned about the
potential scarcity of CICs, it believes that the planned

^{1/} American PCS, L.P., d/b/a American Personal
Communications, a partnership of American Personal
Communications, Inc. and The Washington Post Company.

^{2/} Notice of Inquiry, CC Docket No. 92-237 (released October
29, 1992).

^{3/} E.g., Comments of BellSouth; Comments of Nynex (Phase
II).

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expansion of CICs from three to four digits should move forward; in the interim, conservation techniques should be followed to make available to the industry as many codes as possible.

APC also notes with particular interest the suggestion by the Illinois Commerce Commission that the 4-digit CIC could "allow users to access competitive alternatives before local numbers are made portable. The use of CICs at the local level would be analogous to their use at the interexchange level."^{4/} Whereas intraLATA calls currently are carried by a local exchange carrier ("LEC") unless the caller dials the interexchange CIC (10xxx), use of 4-digit CICs could allow intraLATA pre-subscription, so that a customer would be able to designate a carrier other than the LEC for intraLATA calls, without the need to dial a CIC.

Although APC does not comment on the specific technical changes in LEC switches that would be required to enable extending use of 4-digit CICs to intraLATA pre-subscription, it appears reasonable to estimate that the cost of such changes would be de minimis, since they could be implemented when the LEC makes the necessary software and hardware changes in its end-office switches, Common Channel

^{4/} Comments of Illinois Commerce Commission, p. 9.

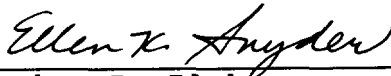
Signaling and Operational Support Systems to implement the 4-digit CICs.^{5/}

End-user access to competitive alternatives is desirable and would serve the public interest. Therefore, APC urges the Commission to investigate the proposal described above and any other potential technical means of providing intraLATA pre-subscription.

Respectfully submitted,

AMERICAN PERSONAL COMMUNICATIONS

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^{5/} The comments indicate the willingness of at least some of the principal LECs to incur the necessary expense to implement the change to 4-digit CICs. For example, Nynex estimates that it would spend \$130 million for its companies to implement the CIC change to four digits, even though potential revenues from use of its companies' access services could not be quantified. Comments of Nynex (Phase II), pp. 4-5. BellSouth estimates a cost of almost \$40 million for its region assuming a market which, "regardless of its size, dictates that expansion is necessary." Comments of BellSouth, pp. 18-19. These companies and others thus should be willing to incur whatever additional de minimis expense is necessary to implement intraLATA pre-subscription.